

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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COACH SERVICES, INC.,	:	Civil Action No. 07-cv-08354 (RPP)
	:	
Plaintiff,	:	
	:	
v.	:	
	:	
VANI U.S.A. INC.,	:	
LA VANI INC., GUANGZHOU HUANI	:	
CO. LTD. and GUANGZHOU	:	
WEINI LEATHER CO. LTD.,	:	
	:	
Defendants.	:	
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**DECLARATION OF NORMAN H. ZIVIN IN SUPPORT OF APPLICATION FOR  
PLAINTIFF'S ATTORNEYS' FEES AGAINST DEFENDANTS WEINI AND HUANI**

I, Norman H. Zivin, hereby declare as follows:

1. I am a partner in the law firm of Cooper & Dunham LLP, attorneys for plaintiff, Coach Services, Inc. I am a member in good standing of the bars of the State of New York and this Court.

2. I make this declaration in support of plaintiff's application for attorneys' fees, as a sanction for the failure of defendants, Guangzhou Weini Leather Co. Ltd. ("Weini") and Guangzhou Huani Co. Ltd. ("Huani"), to comply with plaintiff's discovery requests and an order of this Court dated April 17, 2008, requiring defendants to comply with plaintiff's discovery requests. At a hearing on May 19, 2008, the Court authorized plaintiff to submit an application for attorneys' fees against defendants Weini and Huani.

3. Plaintiff incurred \$3,376.50 in attorneys' fees to Cooper & Dunham LLP during the period March through May 2008 in connection with seeking responses to plaintiff's discovery requests. The actual services rendered by each attorney to that end, the dates of the services and the amounts of the fees are shown in the attached Exhibit 1.

4. Norman H. Zivin is the principal attorney representing plaintiff in this matter and has 40 years of experience in intellectual property litigation. His hourly billing rate is \$575.00. Tonia A. Sayour is the associate attorney representing plaintiff and has 5 years of experience in intellectual property matters. Ms. Sayour's hourly billing rate is \$330.00. The billing rates are well within the normal billing rates for intellectual property attorneys of comparable experience practicing in New York City.

5. I hereby verify that the attorneys' fees set forth above and in Exhibit 1 are correct, that the services reflected therein were actually and necessarily performed, and that the amounts have been or will be billed to plaintiff.

I declare under the penalty of perjury that the foregoing is true and correct.

Dated: June 6, 2008  
New York, NY

/s Norman H. Zivin/  
Norman H. Zivin

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on June 6, 2008, the foregoing **DECLARATION OF NORMAN H. ZIVIN IN SUPPORT OF APPLICATION FOR PLAINTIFF'S ATTORNEYS' FEES AGAINST DEFENDANTS WEINI AND HUANI** was filed using the CM/ECF system. Notice of this filing will be sent to the following counsel of record for the interested parties by operation of the Court's electronic filing system:

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Attorneys for Defendants

/s Norman H. Zivin/  
Norman H. Zivin